

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS



Appeal from Bamberg County

Doyet A. Early, III, Circuit Court Judge

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FEB 06 2015

SC Court of Appeals

THE STATE,

RESPONDENT,

V.

JACQUELINE BACON,

APPELLANT

APPELLATE CASE NO. 2014-001751

MOTION FOR AN EXTENSION OF TIME
IN WHICH TO FILE THE INITIAL BRIEF OF APPELLANT
AND DESIGNATION OF MATTER

Counsel for Jacqueline Bacon respectfully requests a **final extension of thirty (30) days** in which to file the Initial Brief of Appellant and Designation of Matter in this case. This motion is made pursuant to the Order of the South Carolina Supreme Court dated March 18, 2009. This is a fourth request for an extension. In support of this request, counsel shows:

1. The initial brief of appellant and designation of matter are due to be filed with the Court today. The Court has granted counsel three previous extensions.

2. Counsel for Jacqueline Bacon respectfully submits that extraordinary circumstances exist which warrant the granting of an additional extension of time. Given the number of extensions previously granted and the order in which counsel attempts to manage her caseload, counsel hopes that no further extension requests will be required.

3. Counsel is filing the petition for writ of certiorari and accompanying appendix in the case of Vladimir Pantovich v. State with the Supreme Court, today, February 6, 2015. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Clarence Myers v. State with the Supreme Court on February 2, 2015. Counsel filed the brief of respondent in the case of State v. Ashley Moore with the Supreme Court on January 21, 2015. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Ethan Mack v. State with the Supreme Court on January 12, 2015. Counsel filed the brief of respondent in the case of State v. Alex Robinson with the Supreme Court on January 7, 2015. Counsel filed the petition for writ of certiorari and accompanying appendix in the case of Jerene Hayward v. State with the Supreme Court on January 7, 2015. Counsel had an oral argument in the case of State v. Conrad Slocumb in the Court of Appeals on January 6, 2015. Counsel had oral argument in the case of State v. Rajerick Knight in this Court on January 5, 2015.

4. Counsel makes this request in good faith and not for purpose of delay. Counsel intends to continue to work on the cases with more than three extensions first so that the caseload will hopefully become more manageable in the near future, and less extensions will need to be requested.

5. Counsel for the Attorney General's office consents to this request shown by signature below.

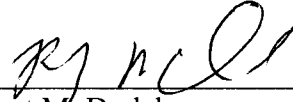
WHEREFORE, the undersigned counsel would respectfully request a **final thirty (30) day extension** in which to file the initial brief of appellant and designation of matter in this case based upon the above exigent circumstances.

Respectfully submitted,

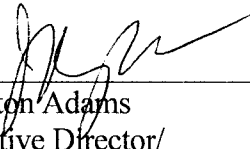


Laura R. Baer
Appellate Defender

Attorney for Appellant



Robert M. Dudek
Chief Appellate Defender



T. Patton Adams
Executive Director/
J. Hugh Ryan, III
General Counsel

This 6th day of February, 2015.

I consent:



Salley W. Elliott, Esquire